

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO, LLC,)
Plaintiffs,)
- vs -) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939
OTTOMOTTO LLC; OTTO)
TRUCKING, LLC,)
Defendants.)

VIDEOTAPED DEPOSITION OF JOHN BARES,
a witness, called by the Plaintiff for examination,
in accordance with the Federal Rules of Civil
Procedure, taken by and before Tammie Elias, RPR and
Notary Public in and for the Commonwealth of
Pennsylvania, at the office of Reed Smith, 225 Fifth
Avenue, Suite 1200, Pittsburgh, Pennsylvania, on
Friday, June 16, 2017, commencing at 9:05 a.m.

JOB No. 2640097

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1 I read that correctly? 03:12p

2 A. Yes. 03:12p

3 Q. I'd like to ask you some questions about this 03:12p

4 bullet here. So when you wrote that he would 03:12p

5 bring filtered advice about what to try and 03:12p

6 not try, what does that refer to? 03:12p

7 A. Filtered advice to me was know-how. It's like 03:12p

8 which way to attack the mountain and he had 03:12p

9 been at this since I met him that day in the 03:12p

10 desert in 2004, multiple companies, multiple 03:12p

11 efforts. The first guy to send an autonomous 03:12p

12 car across the Bay Bridge, he knew a lot about 03:12p

13 autonomy, so he would bring filtered men, he's 03:12p

14 not going to bring direct advice from a prior 03:12p

15 company such as Google, but he would bring 03:12p

16 filtered to me, like you filtered up enough 03:12p

17 and then it's know-how. 03:12p

18 Q. So the second part here you write that is [REDACTED] 03:12p

19 [REDACTED] 03:12p

20 [REDACTED] 03:12p

21 [REDACTED] What does that refer to? 03:13p

22 A. [REDACTED] 03:13p

23 [REDACTED] 03:13p

24 [REDACTED] 03:13p

25 [REDACTED] 03:13p

1 [REDACTED] 03:13p

2 Q. So then the next bullet says worked for 03:13p

3 Velodyne for a spell, not sure about that 03:13p

4 except that he knows their IP. Did I read 03:13p

5 that correctly? 03:13p

6 A. Uh-huh. 03:13p

7 Q. What does that refer to? 03:13p

8 A. Just what it says, he worked for Velodyne I 03:13p

9 believe around 2005 he was a consultant or an 03:13p

10 employee, he sold sensors for them. And I 03:13p

11 didn't know much about his relationship with 03:13p

12 them, but he would certainly have known their 03:13p

13 IP given that he worked for them or was a 03:13p

14 consultant for them. 03:13p

15 Q. The next section here says warnings. The 03:13p

16 first one I think we talked about this 03:13p

17 earlier, heard bad things from Salesky, do you 03:14p

18 see that? 03:14p

19 A. Uh-huh. 03:14p

20 Q. So when you were talking earlier about what 03:14p

21 Mr. Salesky told you, you were mostly focusing 03:14p

22 on a conversation, an hour long conversation 03:14p

23 he had with you in either late January or 03:14p

24 early February; is that correct? 03:14p

25 A. Correct. 03:14p